

EXHIBIT A

Fischer, Adam (USAPAW)

From: Fischer, Adam (USAPAW)
Sent: Thursday, April 20, 2023 2:59 PM
To: 'Guy Donatelli'
Cc: Teke.brown@[REDACTED]
Subject: RE: Dubinchik Interview
Attachments: Requests for Documents to Charter Choices.pdf

Guy –

To follow up on last week's interview of Ms. Dubinchik and our exchange below, I've attached a set of document requests directed to Charter Choices.

Typically, our Civil Investigative Demands ask for responses within 20 days, but as this is an informal request, we would simply ask that you provide a target response date that falls somewhere within the next 60 days. If that date becomes unworkable for any reason, or you need to make rolling productions, we can work with you to create a reasonable timeline.

Of course, if Charter Choices decides that it cannot accept this informal request, please let me know. I just ask that you provide that notice by April 30, so we can adjust and get a CID out. Also, if Charter Choices requires a confidentiality agreement to make certain productions, we can get one in place.

Feel free to give me a call if you have any questions or concerns.

Thank you.

Adam B. Fischer
Assistant United States Attorney
Direct: 412-894-7343
Cell: [REDACTED]

From: Fischer, Adam (USAPAW)
Sent: Friday, April 14, 2023 10:22 AM
To: Guy Donatelli <gdonatelli@[REDACTED]>
Subject: RE: Dubinchik Interview

Great. Thanks again, Guy.

We'll try to get you a list by the middle of next week.

Have a nice weekend.

Adam B. Fischer
Assistant United States Attorney
Direct: 412-894-7343
Cell: [REDACTED]

From: Guy Donatelli <gdonatelli@[REDACTED].com>
Sent: Friday, April 14, 2023 10:02 AM
To: Fischer, Adam (USAPAW) <AFischer@[REDACTED]>
Subject: [EXTERNAL] RE: Dubinchik Interview

Thanks Adam – I'll try for the next one.

Put a list of the documents you need informally and I'll have them assembled and provided.

Guy

From: Fischer, Adam (USAPAW) <Adam.Fischer@[REDACTED]>
Sent: Friday, April 14, 2023 9:18 AM
To: Guy Donatelli <gdonatelli@[REDACTED]>
Subject: Dubinchik Interview

Guy –

Try this link, if you're still having trouble signing/logging in.

[Join on the web](#)

Adam B. Fischer
Assistant United States Attorney
United States Courthouse
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Definitions:

- “Charter Choices” shall mean Charter Choices, Inc., and all of its parent and/or subsidiary corporations, members, directors, officers, employees, and agents.
- “PCPCS” shall mean the Pennsylvania Coalition of Public Charter Schools, and all of its parent and/or subsidiary corporations, members, directors, officers, employees, and agents.
- “CSP Grant” shall mean the Charter Schools Program Grants to State Entities administered by the United States Department of Education, and awarded to PCPCS on or about September 30, 2020.
- “CSP Application” shall mean the written application for the CSP Grant that PCPCS submitted to the United States Department of Education on or about May 12, 2020, as well as any and all amendments, addendums, exhibits, correspondence, and other supporting documents submitted in conjunction with said written application.

Requests for Documents

1. All documents that Charter Choices and/or PCPCS distributed or disseminated in or around 2020, including any social media posts, online advertisements, letters, or emails, which promoted, solicited, advertised, and/or provided information regarding the Peer Review Team, and the opportunity to serve as a Peer Review Team member
2. All applications that Charter Choices received, reviewed, and/or maintained to participate in and/or be a member of the Peer Review Team, and any communications, conflict disclosures, or other supporting documents that were submitted in conjunction with any such applications.
3. All rubrics, templates, and/or forms that Charter Choices created and/or contributed to, and used to review, score, and/or analyze applications to serve on the Peer Review Team.
4. All documents, including any written analyses, memoranda, scorecards, and/or communications, commemorating or reflecting any review, scoring, or screening of Peer Review Team applicants.
5. All documents that Charter Choices and/or PCPCS distributed or disseminated in or around 2020, including any social media posts, online advertisements, letters, or emails, which promoted, solicited, advertised, and/or provided information regarding the CSP Grant, and the opportunity to obtain awards or sub-grants through the CSP Grant.
6. All applications that Charter Choices received, reviewed, and/or maintained for awards and/or sub-grants through the CSP Grant, and any communications, conflict disclosures, or other supporting documents that were submitted in conjunction with any such applications.
7. All rubrics, templates, and/or forms that Charter Choices created and/or contributed to, and used to review, score, and/or analyze applications for sub-grants under the CSP Grant.
8. All documents, including any of the Peer Review Team’s analyses, memoranda, scorecards, and/or communications, commemorating or reflecting any review, scoring, or screening of the applications for sub-grants referenced in Request No. 6, above.

9. All requests for payment, including any timesheets or other supporting documents related to any such requests, that Charter Choices submitted to PCPCS for its work under, on, or related to the CSP Grant or CSP Application.
10. Any contract or services agreement between Charter Choices and PCPCS regarding or related to the CSP Grant or CSP Application.
11. Any communications or other documents regarding or related to the appointment or selection of Abigail Dubinchik to serve as Co-Director of the CSP Grant.
12. Any communications or other documents regarding or related to the decision to remove Abigail Dubinchik as a Co-Director of the CSP Grant.
13. All budgets and/or financial statements reflecting the projected or actual use of CSP Grant funds.